

*October 28, 2020*

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

ANGEL SERVELLON  
Defendant

§  
§  
§  
§  
§  
§

CRIMINAL NO.: H-

**4:20-cr-530**

JUDGE

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, Village Food Mart, is a Houston, Texas, based company engaged in the business of retail purchase and sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

At all times material to this Indictment, EXXON MOBIL, is a Irving, Texas, based company engaged in the business of retail purchase and sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

COUNT ONE

Title 18, United States Code, §§ 1951(a) - Interference with  
Commerce by Robbery

On or about February 16, 2020, in the Houston Division of  
the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly and intentionally obstruct,  
delay, and affect interstate commerce and the movement of  
articles and commodities in commerce by means of robbery, as the  
terms "commerce" and "robbery" are defined in Title 18, United  
States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did  
unlawfully take and obtain the property of Village Food Store,  
located at 5600 Chimney Rock, Houston, Texas, which was in the  
possession and custody of an employee of Village Food Store,  
namely, United States currency, by means of actual and  
threatened force, violence, and fear of injury to those in  
lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A)(ii) - Brandishing  
of a firearm during and in relation to a crime of violence

On or about February 16, 2020, in the Houston Division of  
the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count One.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii).

COUNT THREE

Title 18, United States Code, §§ 1951(a) - Interference with  
Commerce by Robbery

On or about February 29, 2020, in the Houston Division of the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Exxon Mobil, located at 12303 Fondren Road, Houston, Texas, which was in the possession and custody of an employee of Exxon Mobil, namely, United States currency, by means of actual and threatened force,

violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT FOUR

Title 18, United States Code, §§ 924(c)(1)(A)(ii) - Brandishing of a firearm during and in relation to a crime of violence

On or about February 29, 2020, in the Houston Division of the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Three.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii).

COUNT FIVE

Title 18, United States Code, §§ 1951(a) - Interference with Commerce by Robbery

On or about March 2, 2020, in the Houston Division of the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Exxon Mobil, located at 1183 Tidwell, Houston, Texas, which was in the possession and custody of an employee of Exxon Mobil, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a).

COUNT SIX

Title 18, United States Code, §§ 924(c)(1)(A)(ii) - Brandishing of a firearm during and in relation to a crime of violence

On or about March 2, 2020, in the Houston Division of the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly brandish, a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count Five.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(ii).

COUNT SEVEN

Title 18, United States Code, §§ 1951(a) - Interference with  
Commerce by Robbery

On or about March 3, 2020, in the Houston Division of the Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly and intentionally obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms "commerce" and "robbery" are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of Exxon Mobil, located at 6475 Hillcroft, Houston, Texas, which was in the possession and custody of an employee of Exxon Mobil, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT EIGHT

Title 18, United States Code, §§ 924(c)(1)(A)(ii) - Brandishing  
of a firearm during and in relation to a crime of violence

On or about March 3, 2020, in the Houston Division of the  
Southern District of Texas,

ANGEL SERVELLON

defendant herein, did knowingly brandish, a firearm, namely, a  
handgun, during and in relationship to a crime of violence for  
which they may be prosecuted in a court of the United States,  
that being Aiding and Abetting Interference with Commerce by  
Robbery, as alleged in Count Seven.

In violation of Title 18, United States Code, §§  
924(c)(1)(A)(ii).

**NOTICE OF CRIMINAL FORFEITURE**

Pursuant to Title 18, United States Code, Section 924(d(1),  
and Title 28, United States Code, Section 2461(c), the United

States of America hereby gives notice that the firearm(s), involved in violation of Title 18, United States Code, Section 1951(a) and 924(a) as charged in the indictment, are subject to forfeiture, including, but not limited to, the following:

1. Keltic 9mm semi-automatic handgun and any and all accompanying magazines, clips or ammunition.

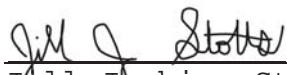
A TRUE BILL:

Original Signature on file

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FOREMAN OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney

BY:   
Jill Jenkins Stotts  
Assistant United States Attorney